REMARKS

Claims 1-20 are pending in this application. By this Amendment, claims 1, 3, 18 and 19 are amended. Claim 3 is amended to include a period. Support for amended claims 1, 18 and 19 may be found in the original specification at, for example, paragraphs [0033] - [0035] and paragraph [0039]. No new matter is added.

Reconsideration of the application is respectfully requested.

The courtesies extended to Applicants' representative by Examiner Rush and Examiner Chang at the interview held June 14, 2007, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

I.   Rejection Under 35 U.S.C. §101

Claim 18 was rejected under 35 U.S.C. §101 as allegedly being directed to nonstatutory subject matter. In particular, the Patent Office rejected claim 18 as allegedly being directed to a computer program.

Claim 18 is amended to be directed to a computer-readable medium comprising computer executable instructions. As such, withdrawal of the rejection under 35 U.S.C. §101 is respectfully requested.

II.   Rejection Under 35 U.S.C. §102(e)

Claims 1-20 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 7,197,158 ("Camara"). Applicants respectfully traverse this rejection.

Camara fails to teach or suggest a method for automatically combining a digital image with text data, including (a) receiving electronic data comprising a digital image, (b) automatically classifying the image according to a predetermined set of categories, and (c) automatically selecting text data from a repository that matches the category of the image

according to a predetermined criterion, <u>wherein (a), (b) and (c) are executed on one or more</u> <u>servers</u>, as recited in claim 1, and similarly recited in claims 18 and 19.

Camara discloses a method and system for generating and integrating metadata into images upon "acquisition." Camara further defines "acquisition" as a local computer system obtaining image information previously generated by a capture device. In contrast, the present claims require receiving electronic data comprising a digital image, automatically classifying the image according to a predetermined set of categories, and automatically selecting text data from a repository that matches the category of the image according to a predetermined criterion <u>to be executed on one or more servers</u>, not a local computer. Nowhere does Camara teach or suggest the features of the present claims to be executed on one or more servers. Camara only discloses a local computer integrating metadata to the images. As such, Camara fails to teach or suggest each and every claimed feature.

For at least the foregoing reasons, claims 1, 18 and 19, and dependent claims thereof, are patentable over the applied references. Thus, withdrawal of the rejection under 35 U.S.C. §102(e) is respectfully requested.

III.   Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-20 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place

this application in even better condition for allowance, the Examiner is invited to contact the

undersigned at the telephone number set forth below.

Respectfully submitted,

James A. Oliff
Registration No. 27,075

Kevin K. Jones
Registration No. 56,809

JAO:KKJ/gml

Date: June 22, 2007

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

DEPOSIT ACCOUNT USE
AUTHORIZATION
Please grant any extension
necessary for entry;
Charge any fee due to our
Deposit Account No. 24-0037